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1 I, Patrick M. Hagan, declare as follows:

2 1. I am an attorney at the law firm of Dinsmore & Shohl, LLP licensed
3 to practice in the State of Ohio. I am admitted Pro Hac Vice in the United States
4 District Court for the Eastern District of Washington, and I am one of attorneys
5 for Defendants Lockheed Martin Services, Inc., and Lockheed Martin
6 Corporation.

7 2. I have personal knowledge of the matters stated in this declaration.
8 If called as a witness to testify to these statements, I could and would competently
9 and honestly testify to their substance.

10 3. A true and correct copy of the 2009 Management Incentive
11 Compensation Plan (“MICP”) A, filed publicly with the Security and Exchange
12 Commission (“SEC”), is attached hereto as **EXHIBIT A**. The document is
13 publicly accessible on the SEC’s website and is available at
14 <https://www.sec.gov/Archives/edgar/data/936468/000119312509038670/dex1015.htm>. I last accessed this link on April 19, 2019.

16 4. A true and correct copy of the 2009 MICP Plan B, filed publicly
17 with the SEC, is attached hereto as **EXHIBIT B**. The document is publicly
18 accessible on the SEC’s website and is available at
19 <https://www.sec.gov/Archives/edgar/data/936468/000119312509153203/dex10.htm>. I last accessed this link on April 19, 2019.

21 5. A true and correct copy of the 2010 MICP Plan, filed publicly with
22 the SEC, is attached hereto as **EXHIBIT C**. The document is publicly accessible
23 on the SEC’s website and is available at
24 <https://www.sec.gov/Archives/edgar/data/936468/000119312510017229/dex991.htm>. I last accessed this link on April 19, 2019.

26 6. A true and correct copy of the 2011 MICP Plan, filed publicly with

DECLARATION OF PATRICK M. HAGAN
IN SUPPORT OF DEFENDANTS’
MOTIONS TO DISMISS - 2

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
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1 the SEC, is attached hereto as **EXHIBIT D**. The document is publicly accessible
2 on the SEC's website and is available at
3 <https://www.sec.gov/Archives/edgar/data/936468/000119312511022096/dex991.htm>. I last accessed this link on April 19, 2019.

5 7. A true and correct copy of the 2013 MICP Plan, filed publicly with
6 the SEC, is attached hereto as **EXHIBIT E**. The document is publicly accessible
7 on the SEC's website and is available at
8 <https://www.sec.gov/Archives/edgar/data/936468/000119312513026251/d473930dex102.htm>. I last accessed this link on April 19, 2019.

10 8. A true and correct copy of the 2014 MICP Plan, filed publicly with
11 the SEC, is attached hereto as **EXHIBIT F**. The document is publicly accessible
12 on the SEC's website and is available at
13 <https://www.sec.gov/Archives/edgar/data/936468/000119312514024241/d658624dex101.htm>. I last accessed this link on April 19, 2019.

15 9. A true and correct copy of the 2015 MICP Plan, filed publicly with
16 the SEC, is attached hereto as **EXHIBIT G**. The document is publicly accessible
17 on the SEC's website and is available at
18 <https://www.sec.gov/Archives/edgar/data/936468/000119312515141818/d887742dex101.htm>. I last accessed this link on April 19, 2019.

20 10. A true and correct copy of the 2016 MICP Plan, filed publicly with
21 the SEC is attached hereto as **EXHIBIT H**. The document is publicly accessible
22 on the SEC's website and is available at
23 <https://www.sec.gov/Archives/edgar/data/936468/000119312516447743/d129701dex101.htm>. I last accessed this link on April 19, 2019.

1 I make this declaration under penalty of perjury under the laws of the
2 United States of America. Executed this 23rd day of April, 2019.

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4 By: */s/ Patrick M. Hagan*
5 Patrick M. Hagan
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DECLARATION OF PATRICK M. HAGAN
IN SUPPORT OF DEFENDANTS'
MOTIONS TO DISMISS - 4

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WA 98111-9402
206.223.7000 FAX: 206.223.7107

CERTIFICATE OF SERVICE

I certify that on the date listed below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which in turn automatically generated a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF system. The NEF for the foregoing specifically identifies recipients of electronic notice.

Executed this 23rd day of April, 2019, at Seattle, Washington.

s/Patti Lane
Patti Lane, Legal Assistant

DECLARATION OF PATRICK M. HAGAN
IN SUPPORT OF DEFENDANTS'
MOTIONS TO DISMISS - 5

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